



October 24, 2023

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The Honorable Eric C. Tostrud
United States District Court
316 N. Robert Street
St. Paul, MN 55101

VIA ECF

**Re: *Chamber v. Choi*, Expedited Handling of Motion for Preliminary Injunction
Case No. 23-CV-2015 (ECT/JFD)**

Dear Judge Tostrud,

Plaintiff Minnesota Chamber of Commerce (“Chamber”) has filed a motion for a preliminary injunction seeking to enjoin enforcement of recently-amended Minnesota Statute § 211B.15, subdivisions 4a and 4b (“statute”).

Prior to filing this motion, the Chamber met and conferred in good faith with Defendants. Although certain Defendants initially expressed they were “seriously considering” a *stipulated* preliminary injunction, they ultimately declined to agree to one. The meet and confer process took three weeks, which in turn delayed the filing of the Chamber’s motion for a preliminary injunction. In addition, due to scheduling conflicts of Defendants’ counsel, the this motion could not be scheduled for hearing in the normal course until December 18, 2023.

As we have set forth in the Camber’s motion, the statute at issue goes into effect on January 1, 2024, and the statute is already chilling speech and causing harm to the Chamber and many of its members. Accordingly, we respectfully requests that the Court consider expedited review of this motion and schedule the motion for hearing prior to the current December 18, 2023, hearing date.

Thank you for your attention and consideration to the Chamber’s request.

Very truly yours,

WINTHROP & WEINSTINE, P.A.

s/Thomas H. Boyd

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